

U.S. Department of Justice

United States Attorney Eastern District of New York

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February 13, 2018

BY HAND DELIVERY AND ECF

The Honorable Allyne R. Ross United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

The Honorable Nicholas G. Garaufis United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: United States v. Khosrow Hakimian

Criminal Docket No. 18-71 (ARR)

Dear Judge Ross and Judge Garaufis:

Pursuant to Local Rule 50.3.2, the government hereby notifies the Court that the above-captioned case ("Khosrow Hakimian") is presumptively related to <u>United States v.</u> Parviz Hakimian, No. 18-CR-70 (NGG) ("Parviz Hakimian").

Local Rule 50.3.2(b)(1) provides for a "presumption that one case is 'related' to another when the facts of each arise out of the same charged criminal scheme(s), transaction(s), or event(s), even if different defendants are involved in each case." Local Rule 50.3.2(c)(1) directs the United States Attorney's Office to "give notice to all relevant judges whenever it appears that one case may be presumptively related to another pursuant to Section (b)(1)."

This letter constitutes the notice directed by Local Rule 50.3.2(c)(1). This case is presumptively related to Parviz Hakimian because the facts of Khosrow Hakimian's case arise out of the same criminal transactions and events as charged in Parviz Hakimian. Specifically, Parviz and Khosrow Hakimian are brothers who both held undisclosed foreign bank accounts in Israel. During the relevant years, the accounts were held separately and

jointly and contained millions of dollars. As the case is thus presumptively related, the government respectfully submits that reassignment would be appropriate, as it would likely result in a significant savings of judicial resources and serve the interests of justice.

Respectfully submitted,

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cc: Matin Emouna, Esq. (counsel for Parviz Hakimian) (by email)
Joseph Conway, Esq. (counsel for Khosrow Hakimian) (by email)